

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Sep 22, 2020

SEAN F. McAVOY, CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON DEAN TALBOTT,

Defendant.

NO: 2:20-CR-101-RMP-1

STIPULATED PROTECTIVE
ORDER REGARDING
IDENTIFICATION OF MINOR
VICTIMS PURSUANT TO
18 U.S.C. § 3509

The Court has received and reviewed the Stipulated Motion for Protective Order Regarding Identification of Minor Victims Pursuant to 18 U.S.C. § 3509, ECF No. 21, and is fully advised.

GOOD CAUSE HAVING BEEN SHOWN, the Court hereby **ORDERS** that the Stipulated Motion for Protective Order Regarding Identification of Minor Victims Pursuant to 18 U.S.C. § 3509, **ECF No. 21**, and the accompanying Motion to Expedite, **ECF No. 22**, hearing of the same are **GRANTED**.

1. **IT IS FURTHER ORDERED** that the privacy protection measures mandated by 18 U.S.C. § 3509(d), which apply when a case involves a person

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MINOR VICTIMS PURSUANT TO
18 U.S.C. § 3509 ~ 1

1 under the age of eighteen years who is alleged to be a victim of a crime of sexual
2 exploitation, or a witness to a crime committed against another person, apply to
3 this case.

4 2. **IT IS FURTHER ORDERED** that all persons acting in this case in a
5 capacity described in 18 U.S.C. § 3509(d)(1)(B), shall:

- 6 a. Keep all documents that disclose the names, identities, or any
7 other information concerning minors in a secure place to which
8 no person who does not have reason to know their contents has
9 access;
- 10 b. Disclose such documents or the information in them that
11 concerns minors only to persons who, by reason of their
12 participation in the proceeding, have reason to know such
13 information;
- 14 c. Not permit Defendant himself to review discovery outside the
15 presence of defense counsel or a defense investigator;
- 16 d. Not permit Defendant to keep discovery in his own possession
17 outside the presence of defense counsel or a defense
18 investigator; and
- 19 e. Not permit Defendant to keep, copy, or record the identities of
20 any minor or victim identified in discovery in this case.

1 3. **IT IS FURTHER ORDERED** that all papers to be filed in Court that
2 disclose the names or any other information identifying or concerning minors shall
3 be filed under seal without necessity of obtaining a Court order, and that the person
4 who makes the filing shall submit to the Clerk of the Court:

5 a. The complete paper to be kept under seal; and

6 b. The paper with the portions of it that disclose the names or
7 other information identifying or concerning children redacted,
8 to be placed in the public record.

9 4. **IT IS FURTHER ORDERED** that the parties and the witnesses shall
10 not disclose minors' identities during any proceedings connected with this case.

11 The parties and witnesses will refer to alleged minor victims only by using agreed-
12 upon initials or pseudonyms (e.g., "Minor Victim 1"), rather than their bona fide
13 names, in motions practice, opening statements, during the presentation of
14 evidence, in closing arguments, and during sentencing.

15 5. **IT IS FURTHER ORDERED** that the government may produce
16 discovery to the defense that discloses the identity and images of alleged minor
17 victims in this case, in order to comply with the government's discovery
18 obligations. Defendant, the defense team, Defendant's attorneys and investigators,
19 and all of their externs, employees, and/or staff members, shall keep this
20 information confidential as set forth above.

